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UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS WORCESTER DIVISION

SANDRA S. KATZ, Plaintiff

V.

DONNA LEE H. WILLIAMS, INSURANCE COMMISSIONER OF THE STATE OF DELAWARE, AS RECEIVER OF NATIONAL HERITAGE LIFE INSURANCE COMPANY IN LIQUIDATION, Defendant

DOCKET NO. 05-40014-FDS

PLAINTIFF'S AUTOMATIC DISCLOSURE PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 26

In accordance with Federal Rules of Civil Procedure 26(a) and Local Rules 26.2, the plaintiff, Sandra Katz ("Katz"), hereby provides her automatic disclosure to the defendant. Katz reserves her right to supplement this production if she becomes aware of additional relevant materials.

- List of Individuals Likely to Have Discoverable Information I.
 - 1. Sandra S. Katz 19 Canton Street Worcester, Massachusetts
- II. Documents and Tangible Things

Katz provides the following categories of documents to the defendants:

Documents within the chain of title for the property located at 19 Canton Street, 1. Worcester, Massachusetts, as recorded with the Worcester County Registry of Deeds.

III <u>Damages</u>

Not applicable.

IV. Insurance

Not applicable.

SANDRA S. KATZ

By her attorney,

Robert B. Gibbons, Esq. BBO #631049 Christopher T. Meier, BBO # 640995 Mirick O'Cornell DoMollio 8 L

Mirick, O'Cornell, DeMallie & Lougee, LLP 1700 West Park Drive

Westborough, MA 01581 Phone: (508) 898-1501

Fax: (508) 898-1502

Dated: March 11, 2005

CERTIFICATE OF SERVICE

I, Robert B. Gibbons, hereby certify that I have this day served a copy of the foregoing document, by mailing a copy, first class mail, postage prepaid, to James F. Creed, Esq., Creed & Formica, 1329 Highland Ave., Needham, MA 02492 and Anita Johnson, Esq., Assistant U.S. Attorney, U.S. Attorney's Office, Moakley United States Courthouse, One Courthouse Way - Suite 9200, Boston, MA 02210

Robert B. Gibbons, Esq.

Dated: March 11, 2005